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April 1, 2020

**Via ECF and Fax to (212) 805-0426**

Hon. Gabriel W. Gorenstein  
United States Magistrate Judge  
United States District Court, Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Ubiquiti Inc. v. Peraso Technologies Inc.*  
Case No. 20-CV-01312 (LTS) (GWG)

Dear Magistrate Judge Gorenstein:

This letter addresses a request to this Court for approval of an extension of time until May 7, 2020 for certain defendants to respond to the Amended Complaint of plaintiff Ubiquiti, Inc. Ubiquiti's counsel agrees to the following terms and date for responses. There have been no previous requests for time extensions.

This firm represents defendants Bill McLean, Jim Whitaker, David Adderley, Imed Zine, and Riadh Zine (the "Individual Defendants") along with Peraso Technologies, Inc. Peraso has answered Ubiquiti's Amended Complaint, filed on March 10, 2020. Mr. McLean and Mr. Imed Zine have been served with the Amended Complaint. The deadlines for Mr. McLean and Mr. Imed Zine to respond to answer or respond is April 3, 2020, and the deadline for Mr. Imed Zine is April 7, 2020.

Mr. Whitaker, Mr. Adderley, and Mr. Riadh Zine have not been served but each has authorized this firm to accept service on his behalf in exchange for the agreed extension of time for which we are seeking the Court's approval.<sup>1</sup> An extension of time for Mr. McLean and Mr. Imed Zine would therefore align their responses with all but one of the other defendants. This would maximize efficiency for the parties and for the Court as well.

We therefore respectfully request that the Court set May 7, 2020 as the extended deadline for Mr. McLean and Mr. Imed Zine and set that same deadline for Mr. Whitaker, Mr. Adderley and Mr. Riadh Zine.

Very truly yours,

s/Jodyann Galvin

Jodyann Galvin

cc: Mario Aieta, Esq.

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<sup>1</sup> Mr. Shawn Abbott has not been served and has not authorized counsel to accept service on his behalf.